

Exhibit 7

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ROBERT L. JANECA, Individually, and as)	
Administrator of the Estate of John R. Janega,)	No. 2021L006219
Deceased, and Pamela Janega,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC., a)	
foreign corporation, et al.)	
)	
Defendants.)	
)	
_____)	
)	
UNITED SERVICES AUTOMOBILE ASSOC.)	
as subrogee of MARK L. STEHLING,)	
)	
Intervening Plaintiff,)	
)	
vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC.,)	
)	
Defendant.)	

**PLAINTIFFS' SECOND SET OF REQUEST FOR PRODUCTION OF DOCUMENTS
ADDRESSED TO TRANSFORM HOLDCO LLC**

Pursuant to Illinois Supreme Court Rules, you are hereby requested to produce the below-listed documents and/or items for purposes of discovery. Said documents and tangible things (or identical copies thereof) are to be produced at the offices of DE LUCA LEVINE LLC, 301 East Germantown Pike, Third Floor, East Norriton, PA 19401, within twenty-eight (28) days of the date of service hereof and supplemented thereafter in accordance with the Illinois Supreme Court Rules.

Definitions and Instructions

A. Definitions

1. **Document** – When used in these requests, the term “document” shall be construed in its broadest sense so as to include recorded information in any form, and shall include without limitation, both an original and any non-identical copy, writing, any printed or graphic representation, catalogue, circular, advertisement, brochure, label, manual, report, letter, drawing, sketch, note, and memorandum. The term “document” shall also include any information stored

in, maintained on, or accessible through computers, disk drives, or other limitation program files, data files and data compilations from which information can be obtained (translated, if necessary, by you, into a reasonably useable form), together with the codes or programming instructions and other materials necessary to understand and to use such systems.

2. **Transform Holdco LLC, You, and Your** – When used in these requests, the terms “Transform Holdco,” “You,” and “Your” shall mean Transform Holdco LLC, its predecessors and successors in interest, its present and former officers, directors and employees, its parent, subsidiaries, divisions, entities, and affiliated companies, and its attorneys, representatives, agents and all other persons acting or authorized to act on its behalf, including third-party entities.

3. **Sears** – When used in these requests, the term “Sears” shall mean Sears, Roebuck and Co., Sears Holdings Management Corporation, and/or Sears Holdings Corporation.

B. Instructions

1. Your responses to these requests shall be served within the time frame provided by the Illinois Supreme Court Rules.

2. If you refuse to respond to any of these requests, or to produce any document, on the basis of a claim of privilege or exemption from discovery, please furnish the following information for each such document:

- a. date(s) the document was generated,
- b. identity of the author(s) of the document,
- c. description of the document (e.g., letter, deed, memorandum, etc.),
- d. identity of any indicated recipient(s) of the document,
- e. identity of every person to whom the document has ever been disclosed, and the date(s) and circumstances of each such disclosure,
- f. subject matter of the document,
- g. basis for claiming privilege or exemption from discovery, and
- h. all facts upon which you rely to support your claim or privilege or exemption from discovery.

3. In the event you object to any request in whole or in part, state in complete detail in your response the nature of your objection, and comply with any part of the request to which you do not object.

4. These requests require you to provide information within your possession, custody, or control, and within the possession, custody, or control of anyone over whom you have control, including without limitation, any officer, agent, servant, employee, attorney, insurance company, investigator, or independent adjusting company.

5. These requests are continuing in character so as to require you to promptly supplement your responses if you obtain further or different information or documents after serving your responses, in accordance with the Illinois Supreme Court Rules.

DOCUMENTS TO BE PRODUCED

The following documents shall be produced:

1. Your Operating Agreement, and/or any other agreement(s) evidencing Your bylaws and/or Your ownership, operations, officers, and the responsibilities of Your members.
2. The Operating Agreement of any entity that possesses an ownership interest in You, either directly or through other entities, and/or any other agreement(s) evidencing Your bylaws and/or Your ownership, operations, officers, and the responsibilities of Your members.
3. Any and all agreements related to Your purchase of any assets from Sears.

Respectfully submitted,

BY: Mark V. Ferrante

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Dated: December 27, 2022

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COUNTY DEPARTMENT, LAW DIVISION

ROBERT L. JANECA, Individually, and as)	
Administrator of the Estate of John R. Janega,)	No. 2021L006219
Deceased, and Pamela Janega,)	
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Plaintiffs,)	
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UNITED SERVICES AUTOMOBILE ASSOC.)	
as subrogee of MARK L. STEHLING,)	
)	
Intervening Plaintiff,)	
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vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC.,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Plaintiffs' Second Set of Requests for Production of Documents Addressed to the Transform Holdco LLC was duly served on December 27, 2022, upon the following via e-mail as follows:

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s/ Patrick A. Hughes
Patrick A. Hughes, Esquire